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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT RAMIREZ, ROBERT
HARRIS, LUIS POCASANGRE
CARDOZA, JOSE SALCEDO, A.
SHAPPELLE THOMPSON,
CORETTA SILVERS (formerly
VICK), BLANCA NELLY AVALOS,
and AMY SEVERSON, on behalf of
themselves and all other similarly
situated,

Plaintiffs,

and

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff-Intervenor,

vs.

CINTAS CORPORATION,

Defendant.

CASE NO. C04-0281-JSW

**ADMINISTRATIVE REQUEST FOR
LEAVE TO FILE JOINT CASE
MANAGEMENT CONFERENCE
STATEMENT IN EXCESS OF 15
PAGES**

AND ORDER THEREON

CMC Date: June 10, 2005
Time: 1:30 p.m.
Place: Courtroom 2, 17th Floor
Judge: Hon. Jeffrey S. White

CMC Statement
Filing Date: June 3, 2005

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1 Plaintiffs Robert Ramirez, et al., Plaintiff-Intervenor Equal Employment
2 Opportunity Commission, and Defendant Cintas Corporation jointly submit this
3 Administrative Request to file the Joint Case Management Conference Statement
4 submitted herewith. That Statement is 24 pages long (including two pages of signature
5 blocks). As grounds for this Request, the parties jointly submit the following:

6 1. Under this Court's Order Setting Case Management Conference and Requiring
7 Joint Case Management Conference Statement entered January 27, 2004 ("January 27 Order"),
8 Statements are limited to twelve (12) pages in length.

9 2. In this case, the parties jointly filed a Stipulation and [Proposed] Order to file a
10 Case Management Conference Statement in excess of twelve pages. On May 31, 2005, the Court
11 entered an Order permitting the filing of a Statement with an additional three pages, and stated
12 that "if additional pages are required, the parties must provide more detail." This Request does
13 that.

14 3. The parties have diligently attempted to draft their Joint Statement as concisely as
15 possible in an effort to meet the limitation imposed by the Court's May 31, 2005 Order.
16 However, the parties have found it not to be possible to draft a Statement of fifteen (15) pages
17 that adequately and properly covers the topics required to be addressed by the Court's January 27
18 Order and Northern District of California Local Rules 16-9(a) and (b), in this case, for the reasons
19 stated below.

20 4. This case is brought as a complex, nationwide class action raising a large number
21 of factual issues and legal claims based on a number of allegedly discriminatory employment
22 practices by Cintas against the ten named Plaintiffs and a class. Various issues of race, national
23 origin, and gender discrimination are raised on behalf of various of the named Plaintiffs and class
24 members under four different federal and state statutes.

25 5. The case is procedurally complex as well, even at this early stage. Several
26 stipulations and orders relating to the scope of the action and the enforceability of arbitration
27 agreements signed by some but not all of the original plaintiffs have already been entered.
28 Related arbitration proceedings have been commenced. In addition to the original parties, the

1 Equal Employment Opportunity Commission has intervened. There is another pending action
2 based on similar allegations of gender discrimination by Cintas pending in another District Court.
3 Plaintiffs' counsel will soon file another action in this Court raising related but not identical
4 issues to those in this case. Both the EEOC and the Plaintiffs have filed, or intend to file, further
5 amended complaints.

6 6. All of these substantive and procedural matters must be and are at least briefly
7 discussed in the Joint Case Management Conference Statement submitted herewith. Necessarily,
8 this information requires a considerable amount of description in the Statement.

9 7. In addition, the parties anticipate a long and complex discovery process, agree to
10 bifurcation into pre- and post-class certification motion stages, and have had extensive
11 discussions, and reached substantial agreement, on how that discovery should be conducted and
12 limits and schedules applicable to the discovery. The parties desire that the discovery plan be
13 embodied in a Court order, and have therefore included its details in the Statement as succinctly
14 as possible.

15 8. Because of the unusual amount of development of this case at the stage of the
16 initial Case Management Conference, and the complexity of the issues and procedures involved,
17 and in order to respond fully to the inquiries made or implicit in the Court's Order specifying the
18 contents of the Case Management Conference Statement, the parties have found it necessary to
19 exceed fifteen (15) pages of text in order to present the requisite matters to the Court. The parties
20 further believe that submission of these matters, in the level of detail embodied in their Joint
21 Statement, will assist the Court in its management of the action, which all parties welcome.

22 For these reasons, the parties jointly request the Court to allow the filing of the Statement
23 submitted with this Administrative Request.

DATED: June 3, 2005

Respectfully submitted,

By: /s/

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Counsel for Plaintiffs Robert Ramirez, et al.

DATED: June 3, 2005

By: /s/

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1 DATED: June 3, 2005

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